



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

July 13, 2021

Delivered electronically to electmattkuehn@gmail.com

Subject: PDC Case 93082

Dear Matt Kuehn:

Below is a copy of an electronic letter sent to Andrew Rheaume concerning a complaint filed June 20, 2021 with the Public Disclosure Commission (PDC) alleging a violation of RCW 42.17A.320 and WAC 390-18 for failing to sufficiently identify the sponsor of political advertising. PDC staff added an allegation of RCW 42.17A.235 and .240 for failing to accurately report expenditures and WAC 390-16-037 and -205 for lacking expenditure details on Full Summary Contributions and Expenditures (C-4) reports.

As noted in the letter below, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into the allegations or take further enforcement action in this matter.

PDC staff reminds you about the importance of identifying the sponsor's name and address on political advertising and including the required expenditure detail on C-4 reports. PDC staff expects in the future you will include proper sponsor identification on political advertising and timely and accurately file reports with the required expenditure detail, in accordance with PDC laws and rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavallee
Executive Director



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July 13, 2021

Delivered electronically to arheaume@comcast.net

Subject: Complaint regarding Matt Kuehn, PDC Case 93082

Dear Andrew Rheume:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed June 20, 2021. The complaint alleged Matt Kuehn, a candidate for Bothell City Council Position 5, may have violated RCW 42.17A.320 and WAC 390-18 by failing to identify the sponsor of political advertising.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, the evidence provided in the complaint and a response from Matt Kuehn, to determine whether the record supports a finding of one or more violations.

After reviewing Kuehn's PDC reports, PDC staff added an allegation of RCW 42.17A.235 and .240 for failing to accurately report expenditures and WAC 390-16-037 and -205 for lacking expenditure detail on Full Summary Contributions and Expenditures (C-4) reports.

We found the following:

- Matt Kuehn registered his candidacy with the PDC for Bothell City Council Position 5 on May 22, 2021. Kuehn is a first-time candidate for public office.
- On June 2, 2021 Kuehn's campaign timely filed a Summary Full Campaign Contribution and Expenditure (C-4) report, listing \$ 3,379.78 in contributions and \$ 1,754.81 in expenditures during the 2021 campaign.
- To date, Kuehn has timely filed PDC reports.
- Per PDC staff request, Kuehn amended two C-4 reports on July 1, adding required expenditure detail for printing expenditures.
- The amended C-4 report, originally filed June 2, lists two March 14 expenditures to Prinrunner, a \$232.76 expenditure for 4,000 campaign postcards and a \$297.58 expenditure for 8,000 campaign flyers.
- In the response, Kuehn stated "This is my first time running for local office and I was under the impression that the campaign contact information (cell phone, email, website) I had on my campaign flyer would suffice for the public to be able to contact and identify

my campaign. To mitigate this issue, am I able to place stickers with the exact language "Paid for by Matt Kuehn for Bothell City Council, 12702 NE 190th St Bothell, WA 98011" on all of my campaign printed pieces.”

- Once made aware of the complaint and requirements, Kuehn promptly added the required sponsor identification and amended his PDC reports to include the required expenditure detail.

Based on these findings, and the fact that Kuehn is a first-time candidate, the advertising was sponsored by and candidate pictured in the advertising, with no intent to conceal sponsorship, and the candidate promptly took action to comply, PDC staff has determined that, in this instance, the failure to include sponsor identification and list expenditure detail does not amount to a violation warranting further investigation.

PDC staff is reminding about the importance of adding the required expenditure detail to C-4 reports and identifying the sponsor's name and address on political advertising, in accordance with PDC laws and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavalley
Executive Director